

EXHIBIT 1

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5)
6) Civil Action No.
7) 5:16-cv-10444-JEL-MKM
8 In re: FLINT WATER CASES) (consolidated)
9)
10) Hon. Judith E. Levy
11) Mag. Mona K. Majzoub
12)
13)
14)
15)
16)

17 HIGHLY CONFIDENTIAL
18 VIDEOTAPED DEPOSITION OF DERRICK JONES

19 Thursday, February 6, 2020
20 at 9:23 a.m.

21 Taken at: Butzel Long
22 41000 Woodward Avenue
23 Bloomfield Hills, Michigan 48304

24 REPORTED BY: CAROL A. KIRK, RMR/CSR-9139
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1 Okay?
 2 A. Okay.
 3 Q. Just like you just did there, see?
 4 So that's what we like.
 5 All right. And we'll go about an
 6 hour and a half, take a break. If you need to
 7 take a break at any time, you just let us know
 8 and we'll do that. All right?
 9 A. Okay.
 10 Q. Thank you.
 11 All right. Mr. Jones, what is
 12 your present home address for the record?
 13 A. My address is 860 Schafer
 14 Street -- that's S-c-h-a-f-e-r -- in Flint,
 15 Michigan 48503.
 16 Q. Are you currently employed by the
 17 city of Flint?
 18 A. I am not.
 19 Q. Are you retired? Did you move on
 20 to a different job? What?
 21 A. I'm currently retired from the
 22 city of Flint.
 23 Q. When did you retire, sir?
 24 A. I retired back in 2018.

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1 Q. All right. Were you working for
 2 the city of Flint at that time when you retired?
 3 A. I'm sorry. Say that again,
 4 please.
 5 Q. Yeah. What -- you retired from
 6 the city of Flint?
 7 A. That is correct.
 8 Q. And you were working at the city
 9 of Flint or for the city of Flint in January of
 10 2015 through March of 2015, right?
 11 A. That is correct.
 12 Q. What was your position then?
 13 A. I was the purchasing manager.
 14 Q. What was your -- what were your
 15 job duties as the purchasing manager?
 16 A. The purchasing manager over --
 17 managed the purchasing department for the city
 18 of Flint. And the -- well, our basic duties
 19 were to handle all of the procurement for the
 20 city of Flint of any types of goods and
 21 services.
 22 Q. All right. Who was your immediate
 23 superior?
 24 A. I reported to -- at the latter

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1 part of my career, to the finance director.
 2 Q. All right. I'm going to direct
 3 your attention to the period January 2015
 4 through March of 2015. Who did you report to
 5 during that time period?
 6 A. It would have been Jerry Ambrose.
 7 Q. Was Mr. Ambrose the emergency
 8 manager for the city at that time?
 9 A. I believe he was the finance
 10 director.
 11 Q. All right. There was a period of
 12 time where he was both the finance director and
 13 the emergency manager.
 14 Do you recall that?
 15 A. I don't -- I mean, I vaguely
 16 remember, but I don't remember the specific time
 17 frame.
 18 Q. All right. Is it -- is it correct
 19 that whoever was the finance director, that
 20 would be the person who was your immediate
 21 superior to whom you would report during that
 22 period of time?
 23 A. That is correct.
 24 Q. And then the finance director,

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1 would that person report to the emergency
 2 manager?
 3 A. That is correct.
 4 Q. Okay. So there are some documents
 5 that we'll get into later that show what
 6 Mr. Ambrose's status was at the time, so we'll
 7 get to that later.
 8 But as far as you remember, your
 9 best memory is that your direct report, your
 10 immediate supervisor, was Mr. Ambrose at that
 11 time, right?
 12 A. Well, I'll just say the finance
 13 director.
 14 Q. Okay. Fair enough.
 15 Who within the Flint -- or strike
 16 that.
 17 As the purchasing manager, did you
 18 have the authority to sign contracts on behalf
 19 of the city?
 20 A. I had the ability to sign purchase
 21 orders. As relates to contracts, I don't recall
 22 at this specific time whether I had that
 23 ability.
 24 Q. When we get to it, you're going to